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Attorneys for Debtor in Possession  
Kartar Singh Khalsa

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In Re:

KARTAR SINGH KHALSA and  
EWTC MANAGEMENT, LLC,  
f/k/a Golden Temple Management, LLC,

Debtor.

Case No. 12-60538-fra11 and  
12-60536-fra11

(Jointly Administered)

KARTAR SINGH KHALSA and  
EWTC MANAGEMENT, LLC,  
f/k/a Golden Temple Management, LLC,

Plaintiffs,

v.

LANE POWELL PC,

Defendant.

**Adv. Proc No. 13-06040fra**

**DECLARATION OF KARTAR SINGH  
KHALSA IN SUPPORT OF  
MOTION TO LIMIT ISSUES FOR  
OBJECTION TO ADMINISTRATIVE  
CLAIM**

Kartar Singh Khalsa ("Kartar") under penalty of perjury states as follows:

KARTAR DECLARATION IN SUPPORT OF  
MOTION TO LIMIT ISSUES 1

1. I am the individual debtor in this case and a manager of EWTC Management LLC the co-proponent of the confirmed plan in this case (“Reorganized Debtors”). The Joint Plan was confirmed on December 14, 2012.

2. The Reorganized Debtors have filed their objection to the administrative claim filed by Lane Powell PC by way of an adversary complaint in this case.

3. The objection to the claim of Lane Powell is independent and separate from the objection to claim issues.

4. Our bankruptcy counsel, Dillon Jackson and Irving Potter are my counsel on the objection to claim matter. Dillon Jackson is principally responsible for handling this dispute.

5. Counsel for the Reorganized Debtors for potential professional negligence claims arising out of the 2007 transaction which transferred substantial interests of Golden Temple of Oregon, is Richard S. Yugler of the firm of Landye Bennett Blumstein LLP of Portland, Oregon.

6. Mr. Yugler is actively collecting documents and other information on the claims against Lane Powell and one other law firm. To date no suit has been filed.

7. From review of the administrative claim filed by Lane Powell herein it is clear that such administrative claim is based upon alleged professional services rendered between the date of the filing of the Debtor’s cases on February 18, 2012 and the date of the filing of the claim on January 28, 2013. Any claim for legal malpractice by the Plaintiffs relates to events that occurred at the time of the management buyout of the Tea Company, then known as Golden Temple of Oregon in 2007.

8. We assert no claims for professional negligence against Lane Powell on the legal work performed on or after February 18, 2012.

9. We understand that our objection to claim in this proceeding, in the event that the Court determines that prosecution of the 2007 malpractice claim is not a mandatory claim in this proceeding, will be limited to other grounds for the objection and that the Court will not consider any counter claim for professional negligence in this proceeding.

KARTAR DECLARATION IN SUPPORT OF  
MOTION TO LIMIT ISSUES 2

Executed under penalty of perjury at Portland, Oregon this 30th day of April, 2013.

KARTAR SINGH KHALSA

/s/ Kartar Singh Khalsa  
Kartar Singh Khalsa

EWTC MANAGEMENT, LLC

/s/ Kartar Singh Khalsa  
Kartar Singh Khalsa  
Manager

KARTAR DECLARATION IN SUPPORT OF  
MOTION TO LIMIT ISSUES 3